| 1 2 3 4 5 6 | PILLSBURY WINTHROP SHAW PITTMAROBERT C. PHELPS 106666 robert.phelps@pillsburylaw.com MICHELLE R. WATTS 232460 michelle.watts@pillsburylaw.com 50 Fremont Street Post Office Box 7880 San Francisco, CA 94120-7880 Telephone: (415) 983-1000 Facsimile: (415) 983-1200 Attorneys for Plaintiff CHEVRON U.S.A. INC. | AN LLP | |
|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| 7 8 | | DISTRICT COURT | |
| 9 | | ICT OF CALIFORNIA | |
| 10 | • • • • • • • • • • • • • • • • • • • • | ISCO DIVISION | |
| 11 | | | |
| 12 | CHEVRON U.S.A. INC., |) No. C 05-03276 WHA | |
| 13 14 | Plaintiff, vs. |)) STIPULATION AND [PROPOSED]) ORDER EXTENDING TIME TO COMPLETE VOLUNTARY ADR | |
| 15 | SSD & ASSOCIATES, |) <u>PROCEDURE</u>) | |
| 16 17 | Defendant. | | |
| 18 19 20 21 22 23 24 25 | Administrator, hereby request that the Court of ADR to April 20, 2006, for the reasons set for The parties have agreed to a voluntary such mediation before William Quinby, Esq., | Plaintiff CHEVRON U.S.A. INC. and Defendant SSD & ASSOCIATES, through a respective counsel, and upon the recommendation of the court's ADR Case ministrator, hereby request that the Court extend the time for completion of voluntary R to April 20, 2006, for the reasons set forth below. The parties have agreed to a voluntary mediation of this dispute and have scheduled mediation before William Quinby, Esq., of Wulff, Quinby & Sochynsky, 1901 rison Street, Suite 1420, Oakland, CA 94612. The parties have a confirmed date for the liation of April 13, 2006 | |
| 26 | • | a mediation before Mr. Quinby for February | |
| 27 28 | 13, 2006. Due to an unanticipated schedule c | onflict on the part of Chevron's client | |
| | | | |

| 1 | representative, that date was rescheduled. The parties have selected April 13, 2006 as their | |
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| 2 | mediation date, principally for two reasons: (1) to accommodate the trial schedule of | |
| 3 | SSD's counsel (who has a three week trial in San Joaquin Superior Court starting March | |
| 4 | 2006) and (2) to permit the parties to depose certain witnesses in advance of the mediation. | |
| 5 | For the foregoing reasons, the parties respectfully request that the deadline for | |
| 6 | completing mediation be extended to April 20, 2006. | |
| 7 | Dated: February, 2006. | |
| 8 | PILLSBURY WINTHROP SHAW PITTMAN LE ROBERT C. PHELPS | |
| 9 | MICHELLE R. WATTS | |
| 10 | 50 Fremont Street Post Office Box 7880 | |
| 11 | San Francisco, CA 94120-7880 | |
| 12 | D /C/ Pohort C Dholag | |
| 13 | By /S/ Robert C. Phelps Robert C. Phelps | |
| 14 | Attorneys for Plaintiff | |
| 15 | CHEVRON U.S.A. INC. | |
| 16 | Dated: February 27 2006. | |
| 17 | PEREZ & MILLER | |
| 18 | Richard L. Perez 3730 Mt. Diablo Boulevard | |
| 19 | Suite 335 Lafayette, CA 94549 | |
| 20 | | |
| 21 | Ву | |
| 22 | Richard L. Perez | |
| 23 | Attorneys for Defendant SSD & ASSOCIATES | |
| 24 | | |
| 25 | | |
| 26 | Based upon the representations of counsel herein and good cause appearing, it is | |
| 27 | hereby ORDERED that the deadline for completion of voluntary ADR proceedings in this | |
| 28 | case is extended to April 20, 2006. | |
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